

**Staff Jurisdiction Analysis Summary
City of Daly City, San Mateo County
2007-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends Daly City (City) as making a good faith effort (GFE) to meet the requirements of AB 939. The City was on a Compliance Order (CO) from August 1, 2007- December 31, 2008, and fully met the terms of its CO and continues to implement and expand its programs.

The City's disposal trend has steadily decreased since 2005, which could be a result of the depressed economy and expansion of diversion program implementation. Its major diversion programs consist of: residential, commercial, and government recycling (including education to residents, businesses, and government operations); expansion of food waste diversion for selected commercial entities; C&D recovery (there are numerous certified C&D facilities surrounding the City); an annual community-wide Reuse Exchange Day; and, HHW collection infrastructure and educational outreach.

Following are other key activity items considered in making a GFE recommendation:

- **Commercial:** The City and its hauler have implemented a commercial food waste diversion program. The City and its hauler also are implementing the implementing Mandatory Commercial Recycling (MCR) requirements, including education, outreach and monitoring activities. The majority (1,640) of commercial sites (including multi-family), businesses, public entities, schools, etc.) are recycling; a number of businesses back haul their recyclables. For the few that are not recycling, the City and hauler are contacting those businesses and multifamily complexes to help them start. The hauler is taking additional steps designed to improve monitoring of commercial sector recycling, e.g. conducting dumpster assessments, taking photos, and following-up with businesses to advise how they could increase recycling and avoid contamination.
- **Construction & Demolition (C&D) Debris:** The building department monitors and enforces the C&D ordinance, which requires the forfeit of a deposit if the applicant does not meet the 50% diversion requirement. There are numerous certified C&D facilities surrounding the City, making this requirement achievable to meet.
- **Procurement:** While the City already procures a number of recycled-content products (RCPs), the Recycling Coordinator (RC) continues to explore other ways to increase RCP purchases by assessing how products and materials are purchased by each department. The RC is currently evaluating the need for a procurement policy to institutionalize green procurement. The City has also adopted a Reusable Bag Ban that becomes effective April 2013.

- **Future assistance:** LAMD staff will work with Daly City to assist in determining if a procurement policy is needed, and to monitor the incorporation of CALGreen language into C&D forms and their flyer. In addition, LAMD staff will monitor the enforcement of the C&D program.

**Staff Jurisdiction Analysis Summary
City of Ferndale, Humboldt County
2010-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends the City of Ferndale (City) as making a good faith effort (GFE) to meet the requirements of AB 939. The City has implemented core diversion programs in both the residential and commercial sectors. This City is also working with other jurisdictions to form a Regional Agency in an effort to improve disposal reporting accuracy and to increase diversion program efficiency. The City also has an effective outreach and education program in place that targets the public, private business, and school sectors.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** The City offers a 65 gallon recycling container for free, an optional 68 gallon green waste container for a small fee, and a 20 gallon garbage collection container, which sends a clear incentive to maximize recycling. A neighborhood drop-off site at the police station predating curbside recycling collection remains well used. Residents also self-haul garbage, recyclables and green waste to nearby Fortuna.
- **Commercial:** The City provides single stream recycling service, which has encouraged commercial involvement in the recycling program. Businesses may also subscribe to the 68 gallon green waste container service. There are 82 active commercial accounts out of the City's 300 businesses. The reason for the low number of commercial collection accounts is that many are small, home based businesses which utilize the residential collection services. Businesses also use drop-off and self-haul options for diversion. The City's recycling coordinator personally contacts all businesses and multifamily complexes that are subject to MCR, and also provides written information about the law with business license applications and renewals. The City's hauler also has a reference to the law on its website with information about how to recycle.
- **Construction & Demolition (C&D) Debris:** Although a C&D ordinance does not exist, the City has adopted the CALGreen code and its hauler recently opened a C&D facility that is available for residential and commercial sector use. Construction in this small Victorian village is infrequent, but well monitored as the City's architecture is a tourist attraction. The City also requires, via ordinance, that recycled-content materials be used in City construction projects, as feasible. This ordinance and CALGreen requirement information is provided with City construction permits. Construction has been slow of late, but the City is preparing for the economic turnaround. The City has updated its Housing Element last year and has included information to control waste during the construction phase. Information is available at the City Hall and Library. Due the City's small size, every project goes before the City Council and is scrutinized for cost and construction related activities including disposal and recycling.

- **Government:** The City provides paper recycling containers for all offices, including the police department. Recycling and source reduction efforts at City facilities include: double sided copying, reusable cups, plates & utensils and acquiring used furniture from the County rather than purchasing new furniture.
- **Follow-up Assistance:** LAMD staff will assist the City of Ferndale and all the cities in Southern Humboldt County to gain better diversion data from haulers for program analysis, help as needed with continued improvement and expansion of curbside diversion programs, green waste collection and C&D diversion programs, provide information and assistance for ongoing MCR implementation, and assist with the regional agency formation process.

**Staff Jurisdiction Analysis Summary
Fresno County Unincorporated
2010-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends Fresno (County) as making a good faith effort (GFE) to meet the requirements of AB 939. The County was on a Compliance Order from 2002-2006. Since completion of its Compliance Order, the County has continued to make program improvements, including the development of a reporting system called the Supplemental 7 – a system for the haulers to track the frequency of waste assessments, education and outreach efforts to residential and commercial customers, participation rates, diversion numbers, the number of businesses serviced, and which businesses do not recycle. The County continues to evaluate and consider ways to improve its diversion programs. It has consistently worked with CalRecycle staff to ensure that areas of concern are addressed. The County's current focus is in resolving misallocations in disposal reporting and improving school and Construction and Demolition (C&D) waste diversion.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** The County runs a voluntary recycling program with 12 Exclusive Service Areas Providers (ESAP) that are required to collect specified materials including general refuse, mixed recyclables, and green waste within service rate areas (urban, rural, mountain). There are 60,700 households in the unincorporated area; of these, 30,674 households receive curbside collection with a variable can rate structure that encourages recycling. Haulers continue to offer recycling to residents through promotions, free subscription to service for the first month, education and outreach. Additionally, a number of large venue events have taken place whereby the CA Conservation Corps partnered with the County for recyclables collection service. Events included: Earth Day, a Civil War reenactment, and a Rock & Roll Revival, to name a few.
- **Commercial:** There are approximately 4,145 businesses in the unincorporated area of Fresno County and the ESAP haulers are providing service to 2,566 of those. Collection pickup is weekly for trash and recyclables. The County has compiled a [Mandatory Commercial Recycling Toolkit](#). The toolkit has timelines, instructions, and implementation guidelines for the haulers to follow including: Tracking businesses meeting/not meeting MCR requirements, education and outreach (including letters) to businesses and multi-family residences, and providing electronic information on MCR. The purpose of the toolkit is to help track all that is being done to implement AB 341 and to better analyze how the program is working. The County plans to use the tracking to address issues such as the number of businesses and multifamily complexes in Fresno County that are not recycling, and how to implement recycling for all businesses and multifamily complexes (including those not falling under the MCR requirements). The County has a strong commercial education and outreach program. The County also implements a Recycling Market Development Zone (RMDZ) program. The RMDZ

program works with the Central Valley Business Incubator (CVBI) encouraging businesses to incorporate/expand recycling efforts and providing them with referrals to appropriate funding, services, and agencies.

- **Construction & Demolition (C&D) Debris:** The County has banned the disposal of C&D debris at County landfills. A directory of recycling opportunities is available during the permitting process and on the County's [Building and Safety](#) webpage. The County is currently drafting a C&D ordinance which will include CALGreen requirements. The County Solid Waste Department is planning to develop a computer program so that the Department will be able to view and track the number of building projects that fall under the criteria for the Green Building Requirements. The idea is to enable the Solid Waste Department to have access to the Permit Department's tracking system. This will enable the County to track, enforce and provide CalRecycle staff with program information. On April 2, 2013, the County will be meeting to review the ordinance and once approved will send it to the Board of Supervisors for consideration of approval.
- **Government:** The County has source reduction and recycling programs in place, including desk-side recycling containers for all staff, and promotes the purchase of recycled-content products through its Preferred Product Purchasing policy. Printing and writing paper that contains at least 20% post-consumer material and recycled paper that includes post-consumer recycled content is purchased. All contracts for printing must specify recycled-content paper. Whenever practical, both sides of paper sheets are used for reports submitted to the County. Purchased copiers and printers must be capable of using recycled-content paper. All County vehicles must use re-refined oil. A retreading service to retread the County's used tire casings must be selected, if practicable, and retread tires must be selected and purchased for use on all County vehicles.
- **Follow-up Assistance:** LAMD staff will continue to monitor and work with the County to enhance and improve its diversion programs with primary assistance to resolve misallocations and reporting errors, to provide assistance with the franchise agreement extension, explore implementing a mandatory residential curbside recycling program to ensure all residents are participating in a recycling program, and in developing a better tracking system for C&D self-hauled materials that are recycled at the County's C&D facility.

**Staff Jurisdiction Analysis Summary
City of Huron, Fresno County
2007-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends Huron (City) as making a good faith effort (GFE) to meet the requirements of AB 939. The City is implementing many of its SRRE and HHWE programs, including a mandatory residential curbside recycling and green waste program, and a mandatory commercial recycling program. This includes multifamily and government recycling programs.

In December 2012, the City's hauler began a pilot residential food waste program. The City plans to have full implementation in early 2013. The City and hauler expects the program designed for the residential sector will significantly decrease disposal. Once the hauler's GORE composting system is operational, the City will consider adding the commercial sector.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** The City and hauler are working to increase diversion using education and outreach especially to the migrant worker population where contamination of bins continues to be an issue, and are addressing the increase in disposal by instituting the food waste pilot program. Participation rate runs at or above 95% among the City's 1400 single family homes.
- **Commercial:** Since establishing mandatory commercial recycling, the City has implemented recycling programs in 24 multi-family complexes (apartments, housing authority, and migrant worker labor camps) that previously did not have such programs. Presentations were made and educational flyers were distributed door-to-door. The commercial sector is now capturing additional recyclable materials, including plastic and tin. In the past, businesses were mainly recycling cardboard, and did not realize that more materials could be placed in the recycling containers.
- **Construction & Demolition (C&D) Debris:** C&D materials are banned from County-operated landfills by way of a C&D recycling policy that was adopted and has been enforced since 2005. CalRecycle and the hauler are working together to develop a brochure for the City regarding CALGreen, as well as information on the hauler's website.
- **Clean-up Events:** The City held two clean-up events in 2011 resulting in 5,950 pounds of material collected and diverted from the landfill (1,700 lbs. of metal, 3,000 lbs. of wood and 1,250 lbs. of e-waste). These events are held every year in the spring and fall.

Follow-up Assistance: LAMD staff will help to address migrant transient recycling contamination through education and outreach including improvements to the City's website, assist with bringing the City current with the new requirements of CALGreen and add information to the City's website, monitor implementation of the CALGreen diversion requirements, and monitor the implementation

**Staff Jurisdiction Analysis Summary
City of Laguna Woods, Orange County
2007-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends Laguna Woods (City) as making a good faith effort (GFE) to meet the requirements of AB 939. The City's SRRE and HHWE core programs are focused on the residential and commercial sectors.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** Since 2011, all single and multi-family residents are provided with recycling service. All containers are provided by the hauler. The City implemented source-separation of dry recyclables at all residential properties in 2011 and is working to do the same in the commercial sector. The franchised hauler provides monthly bulky item pick-up events for appliances, furniture, clothing, and e-waste. Material collected from the bulky item pick-up events is recycled to the maximum extent possible. The City uses Cable TV, a community newsletter and the [City's website](#) to inform residents about the diversion programs. The City also maintains a hotline to answer waste and recycling questions, as well as to schedule free bulky waste and HHW collections.
- **Commercial:** Since 2009, after receiving a grant from Orange County, the City has been working to implement a mandatory commercial recycling (MCR) program. The goal is to require all businesses to have a recycling program in place. Grocery stores back haul materials, such as cardboard, plastic bags, pallets, and food materials for recycling, composting, or reuse. Paper and beverage container recycling is offered free of charge to businesses and commingled recycling bins are offered at approximately 1/3 the cost of an equally sized trash container. Additionally, per its contract the franchised hauler is required to ensure 50% of material generated citywide is diverted. The City also promotes recycling to businesses via emails, presentations to the Chamber of Commerce, brochures and newsletters. In implementing MCR education/outreach the City and its hauler updated their websites, will send annual email blasts, insert information in the "Greening the Woods" e-Newsletter at least once per year, and will annually distribute a MCR letter to multi-family complexes.
- **Construction & Demolition (C&D) Debris:** The C&D Ordinance requires that 50% of this waste stream be diverted regardless of the size of the project. In 2011, the City reached nearly 60% recovery of C&D debris.
- **Procurement and EPR:** The City has an effective recycled-content procurement policy and adopted an EPR ordinance in 2006 that requires retail stores selling batteries to take them back at end of life. The Assistant City Manager monitors and provides to employees information about City source reduction and recycling programs.

- **Follow-up Assistance:** LAMD staff will work with the City to ensure that website updates are made and appropriately linked to the hauler's website, determine if PAYT pricing can be implemented, and see what additional recycled content materials the City can purchase.

**Staff Jurisdiction Analysis Summary
Mariposa County Unincorporated
2010-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends Mariposa (County) as making a good faith effort (GFE) to meet the requirements of AB 939. The County has been working to overcome diversion challenges related to its transient tourist population at Yosemite National Park and quality control issues at the organics facility. The County also is in discussions with the hauler about means to achieve a higher quantity of diversion, including where collected materials are hauled for further processing.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** This program is voluntary with an estimated 90% participation rate. Because curbside is not feasible in this rural County, the public is served by two buy-back centers: one in town at the Pioneer Market and one at the landfill. The landfill buy-back is positioned so self-haulers go to it prior to reaching the tipping area. Landfill staff checks for potential recyclables in the loads, as well. The County also operates four drop-off locations and five oil recycling stations.
- **Commercial:** The biggest waste generators are Yosemite National Park, Caltrans, government, hotels and restaurants catering to Yosemite tourism. Progress in the Park's food collection program has resulted in two loads per week of food waste being sent to the organics facility. The County has implemented a voluntary commercial recycling program. The hauler provides a free 4 cubic yard recycling container to any business. Currently, garbage is run through the sorting lines, which because of design features and quality control issues, currently results in 60% becoming ADC (because it is composed of green or food waste) and 40% is landfilled (due to contaminants such as plastic and other trash); however, the organics facility is slated for new sorting line equipment to improve diversion. All hauler-collected recyclables are shipped and sorted at a mixed waste facility.
- **Construction & Demolition (C&D) Debris:** Adherence to CALGreen's requirement of 50% debris diversion is required in each project's waste management plan when issuing a permit. The County and CalTrans also are discussing the use of stockpiled material for road base.
- **Government:** Recycling containers are stationed inside government buildings in both public and staff areas. There is an extensive recycling education program and display at a high-traffic public library. The library is writing a sustainability plan. The County has adopted both Environmentally Preferable Purchasing and Extended Producer Responsibility policies. Currently, the County is looking into the viability of forming a purchasing pool with other county departments to realize economies of scale to better afford recycled-content paper.

- **Follow-up Assistance:** LAMD staff will continue to assist the County in expanding diversion programs at Yosemite Park, government programs, the landfill, transfer stations and in town at major generators, such as hotels and restaurants. Part of the planned assistance includes contacting the hauler, the county and major generators to perform waste assessments and suggest improvements to increase diversion

Staff Jurisdiction Analysis Summary
City of Mendota, Fresno County
2007-11 CalRecycle Jurisdiction Review Cycle

Based upon the review of diversion program implementation, LAMD staff recommends the City of Mendota (City) as making a good faith effort (GFE) to meet the requirements of AB939. In 2010, Local Assistance and Market Development (LAMD) staff reviewed the City of Mendota's programs and found significant diversion program gaps in the areas of residential and multi-family recycling programs, commercial recycling programs, and government sector programs. As a result of this finding, in 2010 the City was forwarded to CalRecycle's Jurisdiction and Product Compliance Unit (JPCU) for further investigation. LAMD staff informed the City at that time of the program gaps, that it was to be reviewed independently by JPCU, and that the City could avoid a Compliance Order if the program gaps were addressed. During the time of JPCU's review, the City demonstrated that it was able to address the program gaps by expanding and implementing new diversion programs. On August 21, 2012, the Request for Approval for the City's 2007/2008/2009 Jurisdiction Review Findings for the SRRE and HHWE was approved. For 2010/2011 staff has reviewed the City's programs and has found that the City continues to adequately implement its SRRE and HHWE diversion programs, which include mandatory residential curbside recycling, a greenwaste recycling program and mandatory commercial recycling.

The jurisdiction has made improvements to its diversion program infrastructure which includes a comprehensive education and outreach program. Disposal rates have been restructured to an all-in-one payment system resulting in an increase in recycling participation. The hauler conducts waste assessments on an ongoing basis to assist businesses.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** The City has an all-inclusive mandatory residential program where all residents pay for service. The City alternates weekly collection of recyclables and green waste. This program is enforced by a City ordinance whereby a code enforcement officer provides warning notices for non-compliance. For each violation the resident is charged fifty dollars. CalRecycle staff will be working with the hauler and the City to target other events where information about the City's program can be distributed such as at churches, community events, food banks and WIC distribution points. The City will also look for a Community leader to help be an advocate for the City's recycling programs. One of the major barriers for this jurisdiction is the influx of migrant workers during the summer. The City is working to reach this population using education materials, awards, and other actions. As of June 2012, the City completed the implementation of the mandatory multifamily program. The Housing Authority's new manager is supportive of the program and has successfully increased resident participation. A City recycling

coordinator works with the Housing Authority's manager to ensure the continued success of this program.

- **Commercial:** As of May 2011, the City has implemented a mandatory commercial recycling ordinance. The City's hauler is identifying if a business does not have recycling service and then ensures that the business is provided service. All businesses, government entities, and labor camps have implemented recycling programs in addition to five schools. Components of the mandatory commercial recycling program include placing information on the website, sending printed mailers out to commercial customers, making direct contact with businesses, monitoring and resolving multi-family and business contamination issues, and tracking program results.
- **Construction & Demolition (C&D) Debris:** All C&D projects divert at least 50% of material. The hauler provides collection service and transports C&D debris for processing and recycling. Recycling information with step by step instructions and guidelines to follow the City's policy is provided when a contractor visits the City's Planning Department.
- **Events:** In 2011, the hauler provided education and outreach at 10 different events in Mendota over the past year. The City requires permits for special events to incorporate recycling requirements. The City also conducts HHW diversion and waste tire collection events to properly manage these waste streams.
- **Follow-up Assistance:** LAMD staff will be working with the City to identify ways of reaching the transient population using educational materials, awards, etc., to increase recycling and reduce contamination. LAMD will also work with the City to assist with the implementation of green building policies.

**Staff Jurisdiction Analysis Summary
Nevada County Unincorporated
2007-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends that Nevada County (County) has made a good faith effort (GFE) in meeting the requirements of AB939. The County is implementing its SRRE & HHWE programs even while recycling opportunities within the unincorporated County are limited by a number of factors, including: long distances to transport materials from outlying areas, smaller waste quantities affecting economies of scale, low population density, staff resource restrictions and County budgetary limitations. As a result of the budgetary issues, in mid-2012, the County entered into a new contract with its hauler to implement its diversion programs, as well as reconstruct the transfer station to increase diversion.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** In this rural county, there are 31,845 residences and, of those, 15,440 have curbside garbage collection service. There is ample education, incentive, and opportunity to recycle a wide variety of materials at the transfer stations. The County also has an optional Pay As You Throw provision as part of its residential curbside program. The County also offers a guide to safe and healthy products alternatives in the home to residents upon request.
- **Commercial:** The County has an aggressive education program and provides waste assessments. The hauler is required to collect, process, and transport all recyclables from all commercial premises subscribing to service. Recycling collection is at no additional charge for commercial customers subscribing to solid waste collection. However, in the event that a recycling container is found with more than 5% non-recyclables, the container is billed to the business as solid waste disposal. This provides an economic incentive to the commercial customer to reduce contamination.
- **Construction and Demolition (C&D) Debris:** To incentivize participation, a 15% reduced rate is offered for C&D debris recycling. A “Builder’s Guide to Reuse and Recycling” and a brochure is distributed to contractors in the County. Staff also provides recycling diversion assistance to contractors at job sites.
- **Government:** In 2011, 42.2% of all purchases made within the County contained recycled content, including paper products, recycled carpet, and re-refined motor oil for fleet vehicles. In 2010 the County adopted [Resolution #10-054](#) to support extended producer responsibility.
- **Future assistance:** As rolled out in 2012, LAMD staff will continue to work with the County and its hauler to ensure that there are continued efforts to provide recycling information in a bilingual format regarding commercial recycling, C&D diversion, and multi-family recycling, as well as ensuring that there are recycling containers for each multifamily

unit. LAMD staff will also assist with the planned food waste collection program. Staff will also monitor the County's use of the Keep Sierra Green program designed to recognize sustainable practices.

**Staff Jurisdiction Analysis Summary
City of Oroville, Butte County
2007-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends that Oroville (City) has made a good faith effort (GFE) to meet the requirements of AB939. While ash disposal from a biomass facility has increased its disposal rate, the City has maintained effective diversion and procurement programs. The increased disposal rate from ash issue has been resolved due to closure of the biomass facility.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** All City residents pay for weekly mandatory garbage and recycling services using a three colored (gray for trash, green for yard clippings and blue for recycling) cart collection system. The City offers a Pay As You Throw rate structure.
- **Commercial:** The City has adopted a Mandatory Commercial Recycling ordinance. It also is an active participant in the Recycling Market Development Zone (RMDZ) program. A plastic bag company within the Zone received an accreditation award for pollution reduction standards and using post-consumer recycled material in their products. All businesses are required to have garbage and (at no extra cost) recycling service that includes green waste collection. Some larger chain stores backhaul recyclables. In late 2011, a Food Waste Collection Pilot Program was implemented and, due to its success, there are now plans to expand it.
- **Construction & Demolition (C&D) Debris:** A City ordinance requires all material to be taken to the transfer station and separated. Infractions are subject to a five hundred dollar fine. Mandatory C&D recycling has been enforced, and the hauler has been marketing drywall, roofing shingles, and carpet recycling as part of its services. Debris boxes are processed prior to hauling them to the landfill. There is currently an estimated 75% recovery rate of materials. Additionally, CALGreen requirements are distributed with permit applications.
- **Government:** City offices have commingled recycling and double-sided copying and reuse of paper and products is encouraged. City parks practice grasscycling, mulching and composting of organic materials. In 2011, the City implemented an environmentally preferred purchasing policy that includes paper and office supplies and is updated every 3 years. The City has also purchased tire-derived products.
- **Follow-up Assistance:** LAMD staff will continue to assist City staff to adopt more paper waste reduction practices and increase the purchase of recycled-content products. In addition, staff will continue assisting in updating the City's website to include/provide recycling information as needed, strategize on a plan to improve the diversion at multi-

family complexes and to reduce contamination, and help develop a tracking system to better determine C&D material diversion recovery rates.

**Staff Jurisdiction Analysis Summary
City of Portola, Plumas County
2010-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends that Portola (City) has made a good faith effort (GFE) to meet the requirements of AB939. Portola is a remote, rural, Sierra Nevada town at almost 5000 feet, with a small population (2,104 residents). This population lives in an approximate area of 2 square miles. The City has been economically depressed, even prior to the recent economic downturn. Distance to markets, economy of scale, transportation costs, remoteness of location and the climate all contribute to diversion program challenges. In addition, there was a large fire at the local hospital in 2011 which adversely affected the City's ability to meet its disposal target. However, the City has implemented many core programs despite these challenges.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** The City has a mandatory, curbside garbage collection and offers curbside recycling for single family residences. Enforcement of the payment for this curbside service is through the residents' water service. Residents that fail or refuse to pay for waste collection services will have their water service terminated. Residential curbside recycling consists of a three bin system used for collection of commingled recyclables that include: aluminum, steel cans, glass, plastic, newspaper, corrugated cardboard and telephone books. Many residents self-haul recyclables to two local redemption centers.
- **Commercial:** Commercial recycling was identified in the last Biennial Review Cycle as an area needing improvement. Subsequently, the City has approved a rate structure for on-site pickup of commercial commingled recyclables to support the requirements AB 341. The City has developed a Mandatory Commercial Recycling (MCR) program that includes an education and outreach component consisting of print material, a website and direct contact to businesses to be conducted annually working in partnership with the City's hauler. In 2012 this recycling program was expanded from a cardboard-only program to a commingled recycling collection program; in addition, the transfer station started accepting comingled recyclables free of charge.
- **Construction & Demolition (C&D) Debris:** There has been very little construction in the City in recent years. Most C&D materials come from remodel construction work and are taken to the local transfer station where metals, concrete and untreated wood are diverted for reuse and recycling.
- **Government:** Being small and centralized, the City recycles CRV and cardboard from its facilities. All City mowers are fitted for grasscycling. The City has a Recycled Content Product (RCP) purchasing policy to procure recycled paper products and refurbished toner cartridges.

- **Follow-up Assistance:** LAMD staff will make recommendations for continued commercial recycling improvements to expand the program beyond cardboard collection and voluntary drop-off. The City voted in favor of a commercial recycling rate structure for voluntary recycling, but subscriptions have not been forthcoming. LAMD staff will monitor the progress of the City's attempt to get the program in place over the next year. Staff will also work with hauler to differentiate residential and commercial data, track C&D diversion, and work with the City on the implementation of CALGreen. The City has indicated an interest in forming a regional agency with the County that staff will continue to assist with as requested.

**Staff Jurisdiction Analysis Summary
City of San Joaquin, Fresno County
2007-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends that San Joaquin (City) has made a good faith effort (GFE) to meet the requirements of AB939. The City is implementing its SRRE/HHWE programs including a mandatory residential curbside recycling and greenwaste program; mandatory commercial recycling, and government recycling programs. One area the City has recently found that could be affecting its ability to meet their 50% equivalent per capita disposal target revolves around self-hauling materials to the landfill. The City recently found through evaluation of its landfill reports that self-hauling had increased for the 2011 report year. The City and hauler will continue to track self-haul tonnage at the landfill to determine the cause of the increase. The other challenge is illegal dumping. The City and hauler will be working to track illegal dumping and provide additional education and outreach..

Following are key activity items considered in making a GFE recommendation:

- **Residential:** The City has a mandatory residential recycling and greenwaste collection ordinance and uses a three can system (recycling, greenwaste, trash). The City also has a contamination ordinance whereby residents are fined for contaminating recycling or green waste carts – the first offense receives a tag, the second offense receives a \$25 fine, and the third or subsequent offenses results in a \$50 fine. In 2011, residential recycling carts throughout the City were audited twice. During these waste evaluations residents were provided with educational materials and tips on how to reduce their waste.
- **Commercial:** The City has implemented a Mandatory Commercial Recycling (MCR) program, which includes a strong education and outreach effort. Since the start of MCR, five multi-family complexes have implemented recycling programs. The City is working with the housing authority staff to implement recycling programs to include an educational component. Once complete, all multi-family complexes meeting the MCR criteria will have recycling available.
- **Construction & Demolition (C&D) Debris:** C&D is presently banned from County-operated landfills. A directory of recycling locations is provided with all building permits. In 2013, the City is planning to implement an ordinance to meet the CALGreen requirements and to provide code enforcement.
- **Government:** Municipal buildings in San Joaquin are provided with recycling services at no cost. The City has an environmentally preferred purchasing policy to purchase recycled paper products.
- **Follow-up Assistance:** LAMD staff will work with City staff to see about updating its website with diversion program information to improve overall education and outreach

efforts. It has been recommended that a volunteer community member help with this work. Staff will also work with the City to help devise a plan to increase recovery rates in the commercial sector and address the challenges with illegal dumping, as well as continue to look at the self-hauling landfill reports in order to provide education regarding the City's programs.

**Staff Jurisdiction Analysis Summary
City of Sanger, Fresno County
2007-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends that the Sanger (City) has made a good faith effort (GFE) to meet the requirements of AB939. The City has recently shifted its remaining waste handling operations that were conducted by the Public Work Department, including some larger commercial on-site routes and green material processing, to its franchise hauler. Staff will continue to evaluate these programs as the new hauler structures are implemented. Over the course of last 10 years, the collection and processing infrastructure has evolved to create an effective commercial and residential recycling at the contracted materials recovery facility (MRF).

Following are key activity items considered in making a GFE recommendation:

- **Residential:** The City provides weekly collection under its mandatory refuse, single stream and green waste recycling program. Contaminated containers are rare due to the variety of materials recovered, but when contamination is encountered by drivers, containers are tagged and the cart's contents are not collected. The route driver then will check for contamination in the following weeks. The MRF has an extensive recovery system as well. All recyclables except for food, fiber/clothes and polystyrene are recovered.
- **Commercial:** The City has implemented a mandatory commercial recycling (MCR) program that includes working with the hauler to distribute information through utility bill inserts, flyers to commercial customers, new business license applications and renewals, move-in packets, and to provide direct contact twice a year to businesses via waste assessments. The City also has developed a website that will connect to the Institute of Local Government's and hauler's webpages on the subject of MCR. The hauler indicates that it visits each multi-family complex at least annually. The City is also monitoring the commercial recycling program. As a result of the commercial recycling program, improvements in both volume of recycles and reduction in contamination at several multi-family complexes has been achieved.
- **Construction & Demolition (C&D) Debris:** The City of Sanger has a C&D ordinance/policy, and does incorporate CALGreen into its overall C&D program. Because all of the C&D was going through the hauler, combined with the fact that local construction has been very limited over last few years, the City had not developed a detailed C&D tracking system. The City is now in the process of reconfiguring its C&D hauling contract to change from the exclusive arrangement to an "open hauler" system. As a result the City will be developing a C&D tracking and enforcement system.

- **Government:** Desk containers are provided for recycling in all offices and double sided photocopying is a common practice. An environmentally preferred procurement policy encourages procurement of recycled-content paper products.
- **Follow-up Assistance:** LAMD staff will provide assistance to encourage the City to expand its procurement policy to include more product categories for preferred purchasing. LAMD staff will also assist with the diversion program website development to improve education and outreach resources. Additionally, LAMD staff will monitor the changes in the C&D program and will work with the City to help develop an effective C&D tracking and enforcement system. Further investigation into the discrepancies between hauler disposal reporting and the tonnages allocated to the City of Sanger by the landfills will also be checked to work towards resolving any discrepancies. LAMD will also collaborate with the City on establishing a stronger HHW collection infrastructure by working with the County.

**Staff Jurisdiction Analysis Summary
Sierra County Regional Agency
2010-11 CalRecycle Jurisdiction Review Cycle**

Based upon review of diversion program implementation, LAMD staff recommends that Sierra County Regional Agency (RA) has made a good faith effort (GFE) to meet the requirements of AB939. The RA is implementing its programs and continues to make improvements. Like many mountain counties, communities within Sierra County are separated geographically from one another due to topographic features. All recyclable materials must be transported significant distances to material processing facilities. Transportation corridors consist of mountainous highways and roads that create transportation challenges. The small quantities of materials generated within the region limit cost-effective material transportation. Despite these limitations, the RA has implemented a successful source reduction and recycling program that targets material types to attain the greatest reduction in disposal.

Following are key activity items considered in making a GFE recommendation:

- **Residential:** In 2011, the RA implemented commingled recycling at all of its transfer stations and at the landfill, bringing disposal down. More recently, in 2012, the hauler has implemented voluntary commingled blue bag recycling program for commercial and residential customers throughout the County. It is anticipated that this addition to the commercial and residential recycling programs will result in increased diversion in years to come. Materials now collected at the transfer stations include: commingled recyclables, aluminum, glass, cardboard, tires, yard waste, white goods, wood waste, scrap metal, oil, oil filters, e-waste, universal waste and newspaper.
- **Commercial:** The RA recently developed its Mandatory Commercial Recycling program, which includes educational outreach through print materials, a website, direct contact to commercial customers, and working with the hauler to monitor program effectiveness. An economic incentive has been extended to businesses that separate their waste from recyclables. Waste that is separated can be disposed at the landfill with no tipping fee (landfill costs are paid through a yearly parcel fee). However, waste that is disposed that contains recyclables is charged a fee of \$12.00 per yard. There has been a mandatory ordinance requiring pick-up of waste generated at businesses since 2003. Businesses can also participate in the blue bag and drop-off recycling programs.
- **Construction and Demolition:** Sierra County adopted a Building Materials Policy/Ordinance in early 2011. Residents applying for a construction permit are given written directions on how and where to properly dispose of their leftover materials. Separation of construction and demolition material is mandatory at collection sites.

- **Government:** The RA maintains recycling bins for beverage containers, used oil, oil filters, cardboard, e-waste, universal waste, cardboard, and paper at the County Courthouse and at County facilities. The County double-sides photocopies and is now recycling ink jet and laser jet print cartridges. County staff monitors purchasing activities and makes recommendations as needed.
- **Follow-up Assistance:** LAMD staff will follow-up on the RA's CALGreen implementation challenges (primarily lack of C&D recycling infrastructure), siting element revision, landfill capacity issues, potential buy back center options, and promotion of curbside recycling options. Staff will work with the County and hauler to ensure efforts are made to make residents and businesses aware of the blue bag program.